



September 30, 2016

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Subject: OneWeb Petition for Declaratory Ruling: IBFS File No. SAT-LOI-20160428-00041**

Dear Ms. Dortch:

On September 29, 2016, Hughes Network Systems, LLC (“Hughes”) and EchoStar Satellite Operating Corporation (together with their affiliates, “EchoStar”) representatives Jennifer Manner, Jodi Goldberg, and outside counsel Adam Krinsky met with the following representatives of the International Bureau’s Satellite Division: Jose Albuquerque, Karl Kensinger, Kathryn Medley, Stephen Duall (via telephone), Carlos Flores, and Kal Krautkramer.

EchoStar asked the Commission to raise an issue in the upcoming non-geostationary satellite orbit (“NGSO”) notice of proposed rulemaking. Specifically, EchoStar asked the Commission to seek comments on whether to modify the Ka-band plan to permit geostationary satellite orbit (“GSO”) fixed satellite service (“FSS”) operations on a co-primary basis in the 28.6-29.1 GHz and the 18.8-19.3 GHz bands. Currently, NGSO FSS systems are accorded primary status in the 28.6-29.1 GHz uplink band, while GSO FSS systems are permitted to operate on a secondary basis in the band. Today, approximately 1.2 million North American consumers, including those in rural and remote areas, enjoy satellite broadband service delivered over Hughes’ Ka-band GSO FSS network. Hughes has successfully coordinated with 03b’s NGSO FSS system, and based on coordination discussions with OneWeb about its proposed system, Hughes is optimistic that the two parties will reach a positive outcome. But adoption of a co-primary framework is a far better course than ad hoc, individualized discussions.

Seeking comment on this co-primary proposal would be in the public interest. This action would lead to further spectrum sharing and more efficient spectrum use. Moreover, the proposal would not cause undue burden to NGSO FSS systems because this co-primary shared approach is in place across the globe (other than the United States); internationally, the 28.6-29.1 GHz band is allocated to both GSO and NGSO FSS systems on a co-primary basis.

For these reasons, EchoStar requests that the Commission seek comment on a co-primary NGSO and GSO FSS approach in the 28.6-29.1 GHz and the 18.8-19.3 GHz bands.

Finally, as a follow-up to EchoStar’s filing in the OneWeb declaratory ruling proceeding, after discussions with OneWeb, EchoStar confirms that all relevant information has been filed.

Please contact the undersigned if you have any questions.

Respectfully Submitted,

/s/ Jennifer A. Manner

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